

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA**

RYSTA LEONA SUSMAN, Both
individually and as a Legal Guardian of
Shane Allen Loveland; and JACOB
SUMMERS,

Plaintiffs,

v.

THE GOODYEAR TIRE & RUBBER
COMPANY,

Defendant.

**PLAINTIFFS'
EXHIBIT LIST**

Court File Number: 8:18CV127

Plaintiffs submit the following exhibits in the trial of the above captioned matter.

Exhibit No.	Exhibit Name	Date Offered	Marked	Admitted
1.	911 audio of May 1, 2015 accident			
2.	911 audio transcription of May 1, 2015 accident			
3.	Shane Loveland Identification Card			
4.	Rysta Susman's Driver's License			
5.	Photos of Accident Scene			
6.	Photos of Property Damage			
7.	Photos of Shane Loveland in Hospital			
8.	Video of Shane in the Hospital			
9.	Photos of Shane at Home in Hildreth, NE			
10.	Photos of Shane in Physical Therapy			
11.	Photos of Shane with the Kids Before the Accident			
12.	Photos of Shane with his family Before the Accident			
13.	Day in the Life Video of Shane Loveland			
14.	Shane Loveland's Employment File from Dandee Construction			
15.	Medical Records for Shane Loveland from Good Samaritan EMS			
16.	Medical Records for Shane Loveland from Good Samaritan Hospital			
17.	Medical Records from Madonna Rehabilitation			

18.	Medical Records for Shane Loveland from Swedish Medical Center			
19.	Medical Records for Shane Loveland from Quest Diagnostics			
20.	Medical Records for Shane Loveland from Learning Services Corp			
21.	Medical Records for Shane Loveland from Pathology Associates			
22.	Medical Records for Shane Loveland Front Range Spine			
23.	Medical Records for Shane Loveland from Laboratory Corp of American			
24.	Medical Records for Shane Loveland from South Denver Anesthesiologists			
25.	Medical Records for Shane Loveland from Paronorma Orthopedics			
26.	Medical Records for Shane Loveland from Colorado Blood and Cancer Care			
27.	Medical Records for Shane Loveland from Action Care Ambulance			
28.	Medical Records for Shane Loveland from Donald J. Zimmer, D.D.S.			
29.	Medical Records for Shane Loveland from Nebraska Heart Institute			
30.	Medical Records for Shane Loveland from Lincoln Pulmonary & Critical Care			
31.	Medical Records for Shane Loveland from Macauley Psychiatric Services			
32.	Medical Records for Shane Loveland from Central Nebraska Cardiology			
33.	Medical Records for Shane Loveland from Central Nebraska Rehabilitation			
34.	Medical Records for Shane Loveland from Nebraska Specialty Network			
35.	Medical Records for Shane Loveland from Kearney Clinic			
36.	Medical Records for Shane Loveland from Nebraska Orthopaedic			
37.	Medical Records for Shane Loveland from Platte Valley Medical Clinic			
38.	Medical Records for Shane Loveland from Kearney Anesthesia Associates			
39.	Medical Records for Shane Loveland from Midwest Medical Transport			
40.	Medical Records for Shane Loveland from Align Networks, Inc.			
41.	Medical Records for Shane Loveland from Alegent Creighton Clinic			

42.	Medical Records for Shane Loveland from Heartland Hematology & Oncology			
43.	Medical Records for Shane Loveland from Advanced Medical Imaging			
44.	CD-ROMs of Imaging Studies from Good Samaritan Hospital			
45.	CD-ROM of Imaging Studies from Advanced Medical Imaging			
46.	CD-ROM of Imaging Studies from Swedish Medical Center			
47.	Summary of Injuries (Demonstrative)			
48.	Diagnostic Exhibits (Demonstrative)			
49.	Surgical Procedure of Right Ventriculostomy (Demonstrative)			
50.	Surgical Procedure of Insertion of Thoracostomy Tube (Demonstrative)			
51.	Surgical Procedure of Right Thoractomy with Repair of Right Hemidiaphragm (Demonstrative)			
52.	Interactive Exhibit of Shane Loveland (Demonstrative)			
53.	Itemization of Past Medical Bills			
54.	Medical Bills			
55.	Report of Craig H. Lichtblau, M.D.			
56.	CV, Fee Schedule & Deposition/Testimony Log of Craig H. Lichtblau, M.D.			
57.	Craig H. Lichtblau's Continuation of Care for Shane Loveland (Depo Exhibit H)			
58.	Photos relied upon by Dr. Lichtblau			
59.	Craig Lichtblau's File Materials			
60.	Report of Bernard Pettingill, Jr., Ph.D. dated 03/13/19			
61.	Report of Bernard Pettingill, Jr., Ph.D. Pettingill dated 11/19/19			
62.	CV, Fee Schedule, Deposition/Testimony Log of Bernard Pettingill, Jr., Ph.D.			
63.	Basic Assumptions from Bernard Pettingill, Jr., Ph.D. for Shane Loveland			
64.	Loss of Earnings Capacity from Bernard Pettingill, Jr., Ph.D. for Shane Loveland			
65.	Quantitative Economic Loss Summary from Bernard Pettingill, Jr., Ph.D. for Shane Loveland			
66.	Wage Loss Summary from Bernard Pettingill, Jr., Ph.D. for Shane Loveland			
67.	Future Medical Categories from Bernard Pettingill, Jr., Ph.D. for Shane Loveland			

68.	Life Table for White Males relied upon by Bernard Pettingill, Jr., Ph.D. for Shane Loveland			
69.	Minimum Wage Per Hour Table relied upon by Bernard Pettingill, Jr., Ph.D. for Shane Loveland			
70.	Inflation C.P.I. Table relied upon by Bernard Pettingill, Jr., Ph.D. for Shane Loveland			
71.	Medical Inflation Table relied upon by Bernard Pettingill, Jr., Ph.D. for Shane Loveland			
72.	Year to Year Changes in Medical Care Costs relied upon by Bernard Pettingill, Jr., Ph.D. for Shane Loveland			
73.	Bernard Pettingill File Materials			
74.	Injury Photos of Jacob Summers			
75.	Medical Records for Jacob Summers from Good Samaritan Hospital			
76.	Medical Records for Jacob Summers from Central Nebraska Rehabilitation			
77.	Medical Records for Jacob Summers The Nebraska Medical Center			
78.	Medical Records for Jacob Summers from Alpha Rehabilitation			
79.	Medical Records for Jacob Summers from Align Networks, Inc.			
80.	Medical Records for Jacob Summers from New West Sports Medicine			
81.	Medical Records for Jacob Summers from Aegis Sciences			
82.	Medical Records for Jacob Summers from Great Plains Radiology			
83.	Medical Records for Jacob Summers from Kearney Clinic, P.C.			
84.	Medical Records for Jacob Summers from American Institute of Toxicology			
85.	Medical Records for Jacob Summers from Family Practice Associates			
86.	Medical Records for Jacob Summers from David M. McConnell, M.D., LLC			
87.	Medical Records for Jacob Summers from Advanced Radiology of GI			
88.	Medical Records for Jacob Summers from Heartland Pain Clinics			
89.	Medical Records for Jacob Summers from Heartland Surgery Center			

90.	Medical Records for Jacob Summers from Platte Valley Medical Clinic			
91.	Medical Records for Jacob Summers from North Shore Agency			
92.	Medical Records for Jacob Summers from Brian Medical Center			
93.	Medical Records for Jacob Summers from Kearney Regional Medical Center			
94.	Medical Records for Jacob Summers from Eastern Ambulance Services			
95.	Medical Records for Jacob Summers from Madonna Rehabilitation Specialists			
96.	Medical Records for Jacob Summers from Advanced Medical Imaging			
97.	Medical Records for Jacob Summers from Family Physical Therapy & Sports			
98.	Medical Records for Jacob Summers from Frontier Home Medical			
99.	Medical Records for Jacob Summers from Lincoln Radiology Group			
100.	Medical Records for Jacob Summers from Consultants in Gastroenterology			
101.	Medical Records for Jacob Summers from Central Pathology Services, LLC			
102.	Medical Records for Jacob Summers from Burton Prosthetics			
103.	CD-ROM of Imaging Studies for Jacob Summers from New West Sports Medicine			
104.	CD-ROM of Imaging Studies for Jacob Summers from Good Samaritan Hospital			
105.	CD-ROM of Imaging Studies for Jacob Summers from Nebraska Medical Center			
106.	CD-ROM of Imaging Studies for Jacob Summers from Advanced Medical Imaging			
107.	CD-ROM of Imaging Studies for Jacob Summers from Family Practice Association			
108.	CD-ROM of Imaging Studies for Jacob Summers from Kearney Regional Medical Center			
109.	CD-ROM of Imaging Studies for Jacob Summers from Kearney Clinic			
110.	Dandee Employment Records for Jacob Summers			
111.	Itemization of Past Wage loss			
112.	Itemization of Medical Specials			
113.	Medical Bills			
114.	Summary of Injuries (Demonstrative)			

115.	Surgical Procedure of Emergency Abdominal Surgery of 05/01/15 (Demonstrative)			
116.	Surgical Procedure of 05/04/15 Abdominal Surgery (Demonstrative)			
117.	Surgical Procedure of 05/08/17 Posterior Cervical Fusion at C4-7 (Demonstrative)			
118.	Surgical Procedure of 12/13/16 C6-7 Anterior Cervical Discectomy and Fusion (Demonstrative)			
119.	Interactive Exhibit of Jacob Summers (Demonstrative)			
120.	CV of Chris Cornett, M.D.			
121.	CV of James Mahelak, M.D.			
122.	CV of William Sorrell, M.D.			
123.	CV of Paul J. Schenarts, M.D.			
124.	Subject Right Rear Tire Goodyear Wrangler HT LT235/85R16			
125.	Subject Right Rear Wheel			
126.	Companion Left Rear Goodyear Wrangler HT LT235/85R16			
127.	Companion Left Rear Wheel			
128.	Companion Right Front Tire Goodyear Wrangler HT LT235/85R16			
129.	Companion Right Front Wheel			
130.	Companion Left Front Tire Goodyear Wrangler HT LT235/85R16			
131.	Companion Left Front Wheel			
132.	David Southwell's Curriculum Vitae <i>Marked as Exhibit 7 to David Southwell's March 28, 2019 deposition.</i>			
133.	David Southwell's March 2019 Expert Report			
134.	David Southwell's Supplemental Expert Report after Receipt of Global Master Specification			
135.	David Southwell's Subject Right Rear Tire Photographs			
136.	David Southwell's Companion Left Rear Tire Photographs			
137.	David Southwell's Companion Left Front Tire Photographs			
138.	David Southwell's Companion Right Front Tire Photographs			
139.	David Southwell's Subject Right Rear Tire X-rays			
140.	David Southwell's Companion Left Rear Tire X-Rays			

141.	David Southwell's Companion Left Front Tire X-Rays			
142.	David Southwell's Companion Right Front Tire X-Rays			
143.	David Southwell's Companion Left Rear Tire Shearography			
144.	David Southwell's Companion Left Front Tire Shearography			
145.	David Southwell's Companion Right Front Tire Shearography			
146.	David Southwell's Reference Materials			
147.	Micky Gilbert's Curriculum Vitae			
148.	Micky Gilbert's March 12, 2019 Expert Report <i>Marked as Exhibit 4 to Micky Gilbert's deposition taken on April 14, 2019.</i>			
149.	Micky Gilbert's Scene Photographs			
150.	Micky Gilbert's Scene Drone Photographs			
151.	Micky Gilbert's Vehicle Photographs			
152.	Micky Gilbert's Tire and Wheel Photographs			
153.	Micky Gilbert's Accident Calculations <i>Marked as Exhibit 6 to Micky Gilbert's deposition taken on April 14, 2019.</i>			
154.	Micky Gilbert's Subject Vehicle Ghost Image			
155.	Micky Gilbert's Scene Diagram <i>Marked as Exhibit 5 to Micky Gilbert's deposition taken on April 14, 2019.</i>			
156.	Micky Gilbert's Scene Models 1-5			
157.	Micky Gilbert's Vehicle Models 1-2			
158.	Micky Gilbert's Reference Materials (Core Documents) <i>Marked as Exhibit 1 to Micky Gilbert's deposition taken on April 14, 2019.</i>			
159.	Bosch Crash Data Retrieval <i>Blair000219-224</i>			
160.	Gadsden Tire Specification <i>GY Susman 28939-28965</i>			
161.	Gadsden Tire Specification <i>GY Susman 28966-28971</i>			
162.	Gadsden Tire Specification <i>GY Susman 28972-29010</i>			
163.	Spec Change Authorization Sheet <i>GY Susman 28932-28938</i>			
164.	Mold Drawing <i>GY Susman 36466-36473</i>			
165.	GMS – Holographic Examination of RLT			

	<i>GY Susman 36300-36314</i>			
166.	GMS – Tolerances & Limitations of RLT <i>GY Susman 36315-36334</i>			
167.	GMS – X-Ray Disposition RLT <i>GY Susman 36335-36363</i>			
168.	GMS – Cut Tire Programs <i>GY Susman 36364-36367</i>			
169.	GMS – Cut Tire Program <i>GY Susman 36368-36429</i>			
170.	GMS – Quality Assurance Programs <i>GY Susman 36430-36465</i>			
171.	GMS – Tolerances & Limitations RLT <i>GY Susman 36474-36492</i>			
172.	Goodyear/Kelly Load Range E Warranty <i>GY Susman 6187-6202</i>			
173.	Universal Adjustment System Version 3.8 Adjustment data Subject Tire <i>GY Susman 20838-20844</i>			
174.	Goodyear Wrangler HT Tire Information Page <i>Marked as Exhibit 502 to deposition of Jay Lawrence taken on November 15, 2019.</i>			
175.	Important Safety Program dated 02/12/02 <i>GY Susman 01385-01401</i> <i>Marked as Exhibit 503 to deposition of Jay Lawrence taken on November 15, 2019.</i>			
176.	Product Performance Review dated 09/17/97 <i>GY Susman 31805-31824</i> <i>Marked as Exhibit 504 to deposition of Jay Lawrence taken on November 15, 2019.</i> <i>Also, marked as Exhibit 29 to Joseph Zekoski's Deposition taken in Corwin.</i>			
177.	North American Tire Crown Integrity Update dated 04/01/99 <i>GY Susman 24263-24279</i> <i>Marked as Exhibit 505 to deposition of Jay Lawrence taken on November 15, 2019.</i>			
178.	Crown Area Improvements in LR E MPV Tires (An Overview of Kelly/Goodyear Work) dated 11/05/96 <i>GY Susman 26475-26482</i> <i>Marked as Exhibit 506 to deposition of Jay Lawrence taken on November 15, 2019.</i> <i>Also, marked as Exhibit 3 to Beale Robinson's Deposition taken in Frankl.</i> <i>Also, marked as Exhibit 27 to Richard Olsen's Deposition taken in Arredondo bates GY Susman 28228-28268.</i>			

179.	ODI Resume dated 11/21/00 <i>GY Susman 01366-01368</i> <i>Marked as Exhibit 507 to deposition of Jay Lawrence taken on November 15, 2019.</i>			
180.	Correspondence to Dennis O'Connor dated 12/01/00 <i>GY Susman 26385-26391</i> <i>Marked as Exhibit 508 to deposition of Jay Lawrence taken on November 15, 2019.</i> <i>Also marked as Exhibit 17 to Chester Patterson's Deposition taken in Ebanks bates GY Susman 26385-26391.</i> <i>Also marked as Exhibit 25 to Ernest Kessell's Deposition taken in Garcia bates GY Susman 26208-26215.</i>			
181.	Trailer Tire Changeover Program dated 07/07/00 <i>GY Susman 30629-30631</i> <i>Marked as Exhibit 509 to deposition of Jay Lawrence taken on November 15, 2019.</i> <i>Also, marked as Exhibit 1 to Dennis O'Connor's Deposition taken in Boerm.</i>			
182.	Tread/Top Belt 'Throws' dated 01/25/96 <i>GY Susman 21533-21562</i>			
183.	Tread/Top Belt Throw dated 03/01/96 <i>GY Susman 22669-22682</i>			
184.	RLT Damage Claims <i>GY Susman 22229</i>			
185.	RLT Crown Integrity dated 05/13/96 <i>GY Susman 22763-22776</i>			
186.	Adjustments <i>GY Susman 27690-27691</i>			
187.	Damage Claim Summary Cumulative <i>GY Susman 27895</i>			
188.	Chart of LRE claims from 1992-1998 <i>GY Susman 36695-36864</i>			
189.	Chart of LRE Claims <i>GY Susman 36865-37021</i>			
190.	NHTSA Reported Damage Claims <i>GY Susman 4250-4252</i>			
191.	Status of 'Tread Throw' Analysis <i>GY Susman 20946-20952</i>			
192.	RLT LR E Crown Integrity <i>GY Susman 22041-22151</i>			
193.	RLT Crown Durability Testing dated 06/03/96 <i>GY Susman 22259-22273</i>			

	<i>Also, marked as Exhibit 9 to Joseph Zekoski's Deposition taken in Arredondo bates GY Susman 28169-28170.</i>			
194.	'Tread Throw' Team Kickoff Meeting dated 02/16/96 <i>GY Susman 22637-22653</i>			
195.	RLT Crown Separation by Tire Line <i>GY Susman 31348-31350</i>			
196.	Crown Area Improvements in LR E MPV Tires <i>GY Susman 31369-31376</i>			
197.	NHTSA Load Range E Issues <i>GY Susman 6216-6288</i>			
198.	Overlay Implementation Meeting <i>GY Susman 23115-23116</i>			
199.	RLT Crown Integrity Test <i>GY Susman 23156-23158</i>			
200.	Isuzu NPR Truck <i>GY Susman 24624-24634</i>			
201.	FEA of Crown vs Flat Built Nylon Spiral Overlay Tires <i>GY Susman 24918-24927</i>			
202.	Email dated 11/11/98 <i>GY Susman 25494</i>			
203.	LR E Tread Separation Review Meeting 8/23/00 <i>GY Susman 25685-25686</i>			
204.	LR E Tread Separation Update <i>GY Susman 25687-25692</i>			
205.	RLT LR E Crown Integrity <i>GY Susman 26631-26654</i>			
206.	Overlay FEA Analysis <i>GY Susman 27889</i>			
207.	RLT A-Team Meeting (#2. 2/20/96) dated 02/26/96 <i>GY Susman 20873-20876</i>			
208.	RLT A-Team Meeting #3 (2/28/96) dated 02/29/96 <i>GY Susman 20877-20882</i>			
209.	RLT A-Team Meeting #4 (3/6/96) dated 03/07/96 <i>GY Susman 20883-20888</i>			
210.	RLT A-Team Meeting #5 (3/12/96) dated 03/14/96 <i>GY Susman 20889-20899</i>			
211.	RLT A-Team Meeting #6 (3/22/96) dated 03/25/96 <i>GY Susman 22699-22705</i>			

212.	RLT A-Team Meeting # 7 (3/27/96) dated 03/28/96 <i>GY Susman 20907-20915</i>			
213.	RLT A-Team Meeting #9 (4/10/96) dated 04/10/96 <i>GY Susman 20923-20929</i>			
214.	RLT A-Team Meeting #10 (4/17/96) dated 04/10/96 <i>GY Susman 21018-21023</i>			
215.	RLT A-Team Meeting #11 (4/24/96) dated 04/25/96 <i>GY Susman 21024-21032</i>			
216.	RLT A-Team Meeting # 13 (5/08/96) dated 05/09/96 <i>GY Susman 22755-22762</i>			
217.	RLT A-Team Meeting # 14 (5/15/96) dated 05/15/96 <i>GY Susman 21051-21059</i>			
218.	RLT Crown Integrity Team Meeting #16 (5/29/96) dated 05/29/96 <i>GY Susman 21069-21084</i>			
219.	RLT Crown Integrity Team Meeting #17 (6/05/96) dated 06/05/96 <i>GY Susman 22809-22817</i>			
220.	Crown Integrity Team Meeting #18 (6/12/96) dated 06/12/96 <i>GY Susman 21094-21096</i>			
221.	RLT Crown Integrity Team Meeting #19 (6/26/96) dated 06/27/96 <i>GY Susman 21097-21106</i>			
222.	RLT Crown Integrity Team Meeting #21 (7/17/96) dated 07/18/96 <i>GY Susman 21117-21129</i>			
223.	RLT Crown Integrity Team Meeting #22 (7/24/96) dated 07/24/96 <i>GY Susman 22870-22880</i>			
224.	RLT Crown Integrity Team Meeting #23 (8/07/96) dated 08/08/96 <i>GY Susman 21141-21152</i>			
225.	96242RDS 0484-RLT Crown Integrity Team dated 10/08/96 <i>GY Susman 22949</i>			
226.	RLT Adjustment Data Need dated 07/02/96 <i>GY Susman 22950-22951</i>			
227.	ODI Resume <i>GY Susman 00001</i> <i>Marked as Exhibit 15 to Chester Patterson's Deposition at GY Susman 26381.</i>			

228.	Cover Letter responses to NHTSA's inquiries regarding NSA-12jfa PE00-046 <i>GY Susman 03702-03744</i>			
229.	09.05.2001 letter to NHTSA <i>GY Susman 01126-01128</i>			
230.	LA Times 'Goodyear Replaced Tires in 'Silent Recall,' Critics Allege			
231.	Letter to Kenneth Weinstein dated 01/28/02 <i>GY Susman 32013-32039</i>			
232.	Summary of Crown Claims – 1996 Gadsden Production LT245/75R16 LR E Wrangler AT 11BT0 (740 353 439) <i>GY Susman 26432-26433</i> <i>Marked as Exhibit 1 to Beale Robinson's Deposition taken in Frankl.</i>			
233.	Crown Area Improvements in LR E MPV Tires (An Overview of Kelly/Goodyear Work) <i>GY Susman 26434-26474</i> <i>Marked as Exhibit 2 to Beale Robinson's Deposition taken in Frankl.</i> <i>Also, marked as Exhibit 14 to Joseph Zekoski's Deposition taken in Corwin bates</i> <i>GY Susman 31600-31640.</i> <i>Additional bates at GY Susman 31307-31347</i>			
234.	RLT LR-E Crown Integrity Improvement 'ACT' Team <i>GY Susman 26483-26489</i> <i>Marked as Exhibit 4 to Beale Robinson's Deposition taken in Frankl.</i>			
235.	Problem Summary <i>GY Susman 26490-26512</i> <i>Marked as Exhibit 5 to Beale Robinson's Deposition taken in Frankl.</i>			
236.	Fayetteville/Gadsden Cure System Study June 9-13, 1997 <i>GY Susman 26513-26524</i> <i>Marked as Exhibit 6 to Beale Robinson's Deposition taken in Frankl.</i>			
237.	Product Performance <i>GY Susman 26525-26544</i> <i>Marked as Exhibit 7 to Beale Robinson's Deposition taken in Frankl.</i>			
238.	RLT LR-E Crown Integrity Improvement Background/Overview <i>GY Susman 26545-26585</i> <i>Marked as Exhibit 8 to Beale Robinson's Deposition taken in Frankl.</i>			

	<i>Also, marked as Exhibit 31 to Joseph Zekoski's Deposition taken in Corwin bates GY Susman 31833-31873.</i>			
239.	Crown Integrity Review December 4, 1997 <i>GY Susman 26586-26610</i> <i>Marked as Exhibit 9 to Beale Robinson's Deposition taken in Frankl.</i> <i>Also, marked as Exhibit 5 to Joseph Zekoski's Deposition taken in Arredondo bates GY Susman 28153-28165.</i> <i>Also, marked as Exhibit 18 to Joseph Zekoski's Deposition taken in Arredondo bates GY Susman 28184-28191.</i> See also <i>GY Susman 31519-31543.</i>			
240.	RLT Crown Integrity Overview <i>GY Susman 26611-26630</i> <i>Marked as Exhibit 10 to Beale Robinson's Deposition taken in Frankl.</i>			
241.	RLT LR-E Crown Integrity <i>GY Susman 26631-26654</i> <i>Marked as Exhibit 11 to Beale Robinson's Deposition taken in Frankl.</i> <i>Also, marked as Exhibit 13 to Daniel Hammontree, Beale Robinson and Dane Taylor's Depositions taken in Garcia bates GY Susman 25892-25915.</i>			
242.	North America Tire Crown Integrity Update April 1999 <i>GY Susman 26655-26672</i> <i>Marked as Exhibit 12 to Beale Robinson's Deposition taken in Frankl.</i>			
243.	RLT Crown Integrity Team Meeting #15 <i>GY Susman 26673-26681</i> <i>Marked as Exhibit 13 to Beale Robinson's Deposition taken in Frankl.</i> See also <i>GY Susman 21060-21068</i>			
244.	Opportunities for Cured Tire Scrap Reduction <i>GY Susman 26682-26686</i> <i>Marked as Exhibit 14 to Beale Robinson's Deposition taken in Frankl.</i>			
245.	RLT Tread Throw Team #2 Kickoff Meeting <i>GY Susman 26687-26690</i> <i>Marked as Exhibit 15 to Beale Robinson's Deposition taken in Frankl.</i> <i>Also, marked as Exhibit 22 to Joseph Zekoski's Deposition taken in Corwin bates GY Susman 31727-31730.</i>			

246.	RLT Tread Throw Team #2 Kickoff Meeting dated 02/19/96 <i>GY Susman 20869-20872</i>			
247.	RLT A-Team Meeting #8 <i>GY Susman 26691-26697</i> <i>Marked as Exhibit 16 to Beale Robinson's Deposition taken in Frankl.</i> See also <i>GY Susman 20916-20922</i> .			
248.	RLT A-Team Meeting #12 (5/01/96) dated 05/02/96) <i>GY Susman 26698-26707</i> <i>Marked as Exhibit 17 to Beale Robinson's Deposition taken in Frankl.</i> See also <i>GY Susman 21033-21042</i> .			
249.	Crown Integrity Team Meeting #19 <i>GY Susman 26708-26710</i> <i>Marked as Exhibit 18 to Beale Robinson's Deposition taken in Frankl.</i> See also <i>GY Susman 21074-21096</i>			
250.	RLT Crown Integrity Team Meeting #20 <i>GY Susman 26711-26720</i> <i>Marked as Exhibit 19 to Beale Robinson's Deposition taken in Frankl.</i> See also <i>GY Susman 21107-21116</i>			
251.	RLT Crown Separation by Tire Line <i>GY Susman 26721-</i> <i>Marked as Exhibit 20 to Beale Robinson's Deposition taken in Frankl.</i>			
252.	RLT Crown Integrity Meeting Team Meeting #24 <i>GY Susman 26724-26725</i> <i>Marked as Exhibit 21 to Beale Robinson's Deposition taken in Frankl.</i> See also <i>GY Susman 21153-21154</i>			
253.	Tire Cut Section Diagram <i>GY Susman 26726</i> <i>Marked as Exhibit 22 to Beale Robinson's Deposition taken in Frankl.</i>			
254.	RLT Crown Integrity Meeting Team Meeting #25 <i>GY Susman 26727-26729</i> <i>Marked as Exhibit 23 to Beale Robinson's Deposition taken in Frankl.</i> See also <i>GY Susman 21155-21157</i> .			
255.	RLT Crown Integrity Meeting Team Meeting #26 <i>GY Susman 26730-26732</i> <i>Marked as Exhibit 24 to Beale Robinson's Deposition taken in Frankl.</i>			

	<p><i>Also, marked as Exhibit 17 to Daniel Hammontree, Beale Robinson and Dane Taylor's Depositions taken in Garcia bates GY Susman 25923-25928; GY Susman 26851-26856.</i></p> <p><i>Also, marked as Exhibit 3 to Joseph Zekoski's Deposition taken in Arredondo bates GY Susman 28153-28154.</i></p> <p><i>See also GY Susman 21158-21183</i></p>			
256.	<p>Radial Light Truck – Gadsden</p> <p><i>GY Susman 26733</i></p> <p><i>Marked as Exhibit 25 to Beale Robinson's Deposition taken in Frankl.</i></p>			
257.	<p>RLT LR-E Crown Integrity</p> <p><i>GY Susman 26734</i></p> <p><i>Marked as Exhibit 26 to Beale Robinson's Deposition taken in Frankl.</i></p>			
258.	<p>Cure Conditions at Gadsden</p> <p><i>GY Susman 26735</i></p> <p><i>Marked as Exhibit 27 to Beale Robinson's Deposition taken in Frankl.</i></p>			
259.	<p>Gray Gadsden – Solid Fayetteville</p> <p><i>GY Susman 26736-26738</i></p> <p><i>Marked as Exhibit 28 to Beale Robinson's Deposition taken in Frankl.</i></p>			
260.	<p>Lubrication of Press Center Mechanism</p> <p>Lower Bladder Clamp Ring Hub Threads</p> <p><i>GY Susman 26739-26741</i></p> <p><i>Marked as Exhibit 29 to Beale Robinson's Deposition taken in Frankl.</i></p> <p><i>Also, marked as Exhibit 19 to Joseph Zekoski's Deposition taken in Arredondo bates GY Susman 28192-28195.</i></p>			
261.	<p>RLT LR-E Power Point Presentation</p> <p><i>GY Susman 26742</i></p> <p><i>Marked as Exhibit 30 to Beale Robinson's Deposition taken in Frankl.</i></p>			
262.	<p>RLT A Team Meeting #11</p> <p><i>GY Susman 26743-26763</i></p> <p><i>Marked as Exhibit 31 to Beale Robinson's Deposition taken in Frankl.</i></p>			
263.	<p>United States Patent 5,000,239</p> <p><i>GY Susman 26764-26776</i></p> <p><i>Marked as Exhibit 32 to Beale Robinson's Deposition taken in Frankl.</i></p> <p><i>Also, marked as Exhibit 49 to Beale Robinson's Depositions taken in Garcia bates GY Susman 26886-26898.</i></p>			

264.	RLT LR E Crown Integrity Improvement Team Trip; Fayetteville/Gadsden w/o 4/27/97 <i>GY Susman 26777-26780</i> <i>Marked as Exhibit 33 to Beale Robinson's Deposition taken in Frankl.</i> See also <i>GY Susman 21438-21440</i>			
265.	Wrangler Tread/Top Belt Throws <i>GY Susman 26279-26280</i> <i>Marked as Exhibit 1 to Madelon Kominic's Deposition taken in Frankl.</i>			
266.	RLT 235/85R16 Load Range E Tread Throw Investigations <i>GY Susman 26281-26314</i> <i>Marked as Exhibit 2 to Madelon Kominic's Deposition taken in Frankl.</i> <i>Also, marked as Exhibit 15 to Daniel Hammontree, Beale Robinson and Dane Taylor's Depositions taken in Garcia bates</i> <i>GY Susman 25916-25917; GY Susman 26844-26845</i>			
267.	RLT 235/85R16 Load Range E Tread Throw Problem <i>GY Susman 26315-26316</i> <i>Marked as Exhibit 3 to Madelon Kominic's Deposition taken in Frankl.</i>			
268.	RLT 235/85R16 Load Range E Tread Throw Problem Investigations <i>GY Susman 26317-26318</i> <i>Marked as Exhibit 4 to Madelon Kominic's Deposition taken in Frankl.</i>			
269.	Wrangler LT Tire Defects <i>GY Susman 26319-26320</i> <i>Marked as Exhibit 5 to Madelon Kominic's Deposition taken in Frankl.</i> <i>Also, marked as Exhibit 23 to Joseph Zekoski's Deposition taken in Corwin bates</i> <i>GY Susman 31731-31732.</i>			
270.	Holograph "A" Rates Tires <i>GY Susman 26321</i> <i>Marked as Exhibit 6 to Madelon Kominic's Deposition taken in Frankl.</i>			
271.	RLT LR-E Plant Exchange and Mold Extraction Trials <i>GY Susman 26322-26326</i> <i>Marked as Exhibit 7 to Madelon Kominic's Deposition taken in Frankl.</i>			
272.	Wrangler AT Performance <i>GY Susman 26327</i>			

	<i>Marked as Exhibit 1 to James Nespo's Deposition taken in Frankl.</i>			
273.	Letter to Major John Farner <i>GY Susman 26328</i> <i>Marked as Exhibit 2 to James Nespo's Deposition taken in Frankl.</i>			
274.	Wrangler AT Performance <i>GY Susman 26329</i> <i>Marked as Exhibit 3 to James Nespo's Deposition taken in Frankl.</i>			
275.	Tire Information Request <i>GY Susman 26330-26331</i> <i>Marked as Exhibit 4 to James Nespo's Deposition taken in Frankl.</i>			
276.	Handwritten Note <i>GY Susman 26332</i> <i>Marked as Exhibit 5 to James Nespo's Deposition taken in Frankl.</i>			
277.	Dismounted Returned Tire Inspection – Wrangler AT Tires <i>GY Susman 26333-26334</i> <i>Marked as Exhibit 6 to James Nespo's Deposition taken in Frankl.</i>			
278.	Analysis of RLT Load Range E Tires <i>GY Susman 26971-26997</i> <i>Marked as Exhibit 1 to Edward Terrill's Deposition taken in Frankl.</i>			
279.	Tire Aging (Analysis of RLT Load Range E Tires) <i>GY Susman 26998-27014</i> <i>Marked as Exhibit 2 to Edward Terrill's Deposition taken in Frankl.</i>			
280.	Lee Landrover LT235/85R16 E all cond <i>GY Susman 25964-25965</i> <i>Marked as Exhibit 5 to Daniel Hammontree's Deposition taken in Ebanks.</i>			
281.	The Goodyear Tire & Rubber Company Land Rover LT235/85R16, LR E Claims <i>GY Susman 25966</i> <i>Marked as Exhibit 6 to Daniel Hammontree's Deposition taken in Ebanks.</i>			
282.	Cut Back of a Tire <i>GY Susman 28013</i> <i>Marked as Exhibit 1 to Joseph Zekoski's Deposition taken in Ebanks.</i>			
283.	Tire Diagram <i>GY Susman 28014</i> <i>Marked as Exhibit 2 to Joseph Zekoski's Deposition taken in Ebanks.</i>			

	<i>Also marked as Exhibit 2 to Richard Olsen's Deposition taken in Ebanks bates GY Susman 30701.</i>			
284.	Tread/Top Belt Throw dated 04/01/96 <i>GY Susman 21346-21398</i> <i>Referenced as Ebanks 954, 956, 965 and 966 in Joseph Zekoski's Deposition taken in Ebanks.</i>			
285.	Development of Tread Durability Test <i>GY Susman 26372-26374</i> <i>Marked as Exhibit 10 to Chester Patterson's Deposition taken in Ebanks.</i>			
286.	ISUZU NPR, LT215/85R16 Tread Integrity Meeting <i>GY Susman 26375</i> <i>Marked as Exhibit 11 to Chester Patterson's Deposition taken in Ebanks.</i>			
287.	Isuzu NPR Durability Testing Results <i>GY Susman 26376</i> <i>Marked as Exhibit 12 to Chester Patterson's Deposition taken in Ebanks.</i>			
288.	Bent Axle Test for Crown Area Durability <i>GY Susman 26377</i> <i>Marked as Exhibit 13 to Chester Patterson's Deposition taken in Ebanks.</i>			
289.	ISUZU NPR, LT 215/85R16 Durability Improvement <i>GY Susman 26378-26380</i> <i>Marked as Exhibit 14 to Chester Patterson's Deposition taken in Ebanks.</i> <i>Also, marked as Exhibit 4 to Joseph Zekoski's Deposition taken in Arredondo bates GY Susman 28155-28157.</i>			
290.	Letter to ODI dated 08/16/01 <i>GY Susman 26382-26384</i> <i>Marked as Exhibit 16 to Chester Patterson's Deposition taken in Ebanks.</i> <i>Also marked as Exhibit 25 to Beale Robinson's Deposition taken in Ebanks bates GY Susman 26964-26966.</i>			
291.	Letter to Kenneth Weinstein dated 01/28/02 <i>GY Susman 26395-26397</i> <i>Marked as Exhibit 19 to Chester Patterson's Deposition taken in Ebanks.</i> <i>Also, marked as Exhibit 24 to Beale Robinson's Deposition taken in Ebanks bates GY Susman 26961-26963.</i>			

	<i>Also, marked as Exhibit 2 to Dennis O'Connor's Deposition taken in Boerm bates GY Susman 30632-30658. Additional bates at GY Susman 01375-01401.</i>			
292.	Meeting on LT-Metric 'Tread-Throw' Field Problems (9/19-21/95) <i>GY Susman 26899-26902</i> <i>Marked as Exhibit 1 to Beale Robinson's Deposition taken in Ebanks.</i> <i>Also, marked as Exhibit 30 to Richard Olsen's Deposition taken in Arredondo bates GY Susman 28293-28296.</i> <i>Also, marked as Exhibit 12 to Joseph Zekoski's Deposition taken in Corwin bates GY Susman 31550-31553.</i>			
293.	LT-Metric Damage Claim Tire by Date of Production Load Range D & E <i>GY Susman 26903</i> <i>Marked as Exhibit 2 to Beale Robinson's Deposition taken in Ebanks.</i> <i>Also, marked as Exhibit 34 to Richard Olsen's Deposition taken in Arredondo bates GY Susman 28306.</i>			
294.	Overview Conclusions <i>GY Susman 26904</i> <i>Marked as Exhibit 3 to Beale Robinson's Deposition taken in Ebanks.</i>			
295.	Root Cause Investigation #1 Tire Conditions Have Changed <i>GY Susman 26905</i> <i>Marked as Exhibit 4 to Beale Robinson's Deposition taken in Ebanks.</i>			
296.	Building Specification <i>GY Susman 26906-26924</i> <i>Marked as Exhibit 5 to Beale Robinson's Deposition taken in Ebanks.</i>			
297.	Damage Claim Summary <i>GY Susman 26925</i> <i>Marked as Exhibit 6 to Beale Robinson's Deposition taken in Ebanks.</i>			
298.	RLT Tread Throw Team #2 Kickoff Meeting <i>GY Susman 26926</i> <i>Marked as Exhibit 7 to Beale Robinson's Deposition taken in Ebanks.</i>			
299.	Probable Root-Cause Weak Boundary Layer Between RLT Belts 1&2			

	<i>GY Susman 26927</i> <i>Marked as Exhibit 8 to Beale Robinson's Deposition taken in Ebanks.</i>			
300.	Damage Claims Tread Sep Damage Claims Trend for 1995 <i>GY Susman 26928</i> <i>Marked as Exhibit 9 to Beale Robinson's Deposition taken in Ebanks.</i>			
301.	RLT Crown Integrity <i>GY Susman 26929</i> <i>Marked as Exhibit 10 to Beale Robinson's Deposition taken in Ebanks.</i>			
302.	Settled Damage Claims by Year of Manufacture <i>GY Susman 26932</i> <i>Marked as Exhibit 11 to Beale Robinson's Deposition taken in Ebanks.</i>			
303.	Combined Goodyear/Kelly PL Claims Projection <i>GY Susman 26933</i> <i>Marked as Exhibit 12 to Beale Robinson's Deposition taken in Ebanks.</i>			
304.	Problem Summary <i>GY Susman 26934</i> <i>Marked as Exhibit 13 to Beale Robinson's Deposition taken in Ebanks.</i>			
305.	Problem Summary <i>GY Susman 26935</i> <i>Marked as Exhibit 14 to Beale Robinson's Deposition taken in Ebanks.</i>			
306.	Conclusions <i>GY Susman 26936</i> <i>Marked as Exhibit 15 to Beale Robinson's Deposition taken in Ebanks.</i>			
307.	Damage Claims Goodyear/Kelly Light Truck Tires <i>GY Susman 26937</i> <i>Marked as Exhibit 16 to Beale Robinson's Deposition taken in Ebanks.</i>			
308.	Combined Kelly/Goodyear Settled Damage Claims by Tire Size <i>GY Susman 26938</i> <i>Marked as Exhibit 17 to Beale Robinson's Deposition taken in Ebanks.</i>			
309.	Combined Goodyear/Kelly PL Claims Summary by Age of Tire <i>GY Susman 26939</i> <i>Marked as Exhibit 18 to Beale Robinson's Deposition taken in Ebanks.</i>			

310.	RLT LR-Overlay Implementation Planning <i>GY Susman 26940-26941</i> <i>Marked as Exhibit 19 to Beale Robinson's Deposition taken in Ebanks.</i>			
311.	1996 Action Plan Effectiveness <i>GY Susman 26942</i> <i>Marked as Exhibit 20 to Beale Robinson's Deposition taken in Ebanks.</i>			
312.	ISUZU NPR, LT 215/85R16 Durability Improvement <i>GY Susman 26943-26946</i> <i>Marked as Exhibit 21 to Beale Robinson's Deposition taken in Ebanks.</i>			
313.	ISUZU/Pre-Policy Report <i>GY Susman 26947</i> <i>Marked as Exhibit 22 to Beale Robinson's Deposition taken in Ebanks.</i>			
314.	United States Patent 4,815,511 <i>GY Susman 26948-26960</i> <i>Marked as Exhibit 23 to Beale Robinson's Deposition taken in Ebanks.</i>			
315.	Load Range E Truck Tires Alleged Tread/Belt Separations Accidents Involving Deaths or Injuries <i>GY Susman 26216-26218</i> <i>Marked as Exhibit 26 to Ernest Kessell's Deposition taken in Garcia.</i>			
316.	Goodyear AT and ATS Warranty/Goodwill Adjustment Rates <i>GY Susman 26219-26222</i> <i>Marked as Exhibit 27 to Ernest Kessell's Deposition taken in Garcia.</i>			
317.	Customer Contacts Wrangler AT and ATS LRE <i>GY Susman 26223</i> <i>Marked as Exhibit 28 to Ernest Kessell's Deposition taken in Garcia.</i>			
318.	Master Product File Display <i>GY Susman 26270</i> <i>Marked as Exhibit 37 to Ernest Kessell's Deposition taken in Garcia.</i>			
319.	Conclusions <i>GY Susman 25918-25922</i> <i>Marked as Exhibit 16 to Daniel Hammontree, Beale Robinson and Dane Taylor's Depositions taken in Garcia additional bates GY Susman 26846-26850.</i>			
320.	Combined Goodyear/Kelly PL Claims Summary			

	<i>GY Susman 25929-25933 Marked as Exhibit 19 to Daniel Hammontree's Deposition taken in Garcia.</i>			
321.	1996 Tire Guide Load & Inflation Tables <i>GY Susman 25934-25935 Marked as Exhibit 13 to Daniel Hammontree, Beale Robinson and Dane Taylor's Depositions taken in Garcia bates GY Susman 26866-26867.</i>			
322.	RLT Size Breakout <i>GY Susman 25936-25938 Marked as Exhibit 27 to Daniel Hammontree's Deposition taken in Garcia.</i>			
323.	Settled Damage Claims by Year of Manufacture <i>GY Susman 25939-25942 Marked as Exhibit 28 to Daniel Hammontree's Deposition taken in Garcia.</i>			
324.	Settled Damage Claims by Date of Claim <i>GY Susman 25943 Marked as Exhibit 31 to Daniel Hammontree's Depositions taken in Garcia.</i>			
325.	Kelly Exposure <i>GY Susman 25944-25949 Marked as Exhibit 33 to Daniel Hammontree's Deposition taken in Garcia.</i>			
326.	RLT Crown Integrity Improvement <i>GY Susman 25950-25954 Marked as Exhibit 41 to Daniel Hammontree's Deposition taken in Garcia.</i>			
327.	Conclusions/Recommendations <i>GY Susman 25955-25960 Marked as Exhibit 46 to Daniel Hammontree's Deposition taken in Garcia.</i>			
328.	Radial Light Truck – Gadsden <i>GY Susman 25961-25963 Marked as Exhibit 48 to Daniel Hammontree's Deposition taken in Garcia.</i>			
329.	Problem Summary <i>GY Susman 26838-26843 Marked as Exhibit 14 to Beale Robinson's Deposition taken in Garcia. Also, marked as Exhibit 33 to Richard Olsen's Deposition taken in Arredondo bates GY Susman 28305.</i>			
330.	Probable Root-Cause: Weak Boundary Layer Between RLT Belts 1&2 <i>GY Susman 26857-26865</i>			

	<i>Marked as Exhibit 21 to Beale Robinson's Deposition taken in Garcia.</i>			
331.	RLT LR-E Crown Integrity Improvement 'ACT' Team <i>GY Susman 26868-26873</i> <i>Marked as Exhibit 34 to Beale Robinson's Deposition taken in Garcia.</i>			
332.	LR "E" Belt Wire <i>GY Susman 26874-26885</i> <i>Marked as Exhibit 38 to Beale Robinson's Deposition taken in Garcia.</i>			
333.	Isuzu NPR Truck Tire LT215/85R16 Treadwear Report <i>GY Susman 28018-28026</i> <i>Marked as Exhibit 207 to George Edward's Deposition taken in Arredondo.</i> <i>Also, marked as Exhibit 207 to Mark Grund's Deposition taken in Arredondo bates GY Susman 28330-28338.</i>			
334.	Isuzu NPR Tire Problems on Vehicle Durability Test <i>GY Susman 28027-28029</i> <i>Marked as Exhibit 208 to George Edward's Deposition taken in Arredondo.</i> <i>Also, marked as Exhibit 208 to Ray Young's Deposition taken in Arredondo GY Susman 28457-28459.</i> <i>Also, marked as Exhibit 208 to Mark Grund's Deposition taken in Arredondo bates GY Susman 28339-28341.</i>			
335.	Isuzu Tread-Throw Tire <i>GY Susman 28460</i> <i>Marked as Exhibit 209 to Ray Young's Deposition taken in Arredondo.</i> <i>Also, marked as Exhibit 209 to Mark Grund's Deposition taken in Arredondo bates GY Susman 28342.</i>			
336.	Isuzu LT215/85R16 WHT Tread Separation Meeting Summary of Isuzu Dealer Conference in Phoenix on 1/19/95 <i>GY Susman 28030-28033</i> <i>Marked as Exhibit 210 to George Edward's Deposition taken in Arredondo.</i> <i>Also, marked as Exhibit 210 to Ray Young's Deposition taken in Arredondo GY Susman 28461-28464.</i> <i>Also, marked as Exhibit 210 to Mark Grund's Deposition taken in Arredondo bates GY Susman 28343-28346.</i>			

337.	<p>LT215/85R16 WHT Tread Throw <i>GY Susman 28034-28035</i> <i>Marked as Exhibit 211 to George Edward's Deposition taken in Arredondo.</i> <i>Also, marked as Exhibit 211 to Ray Young's Deposition taken in Arredondo GY Susman 28465-28466.</i> <i>Also, marked as Exhibit 211 to Mark Grund's Deposition taken in Arredondo bates GY Susman 28347-28348.</i></p>			
338.	<p>LT215/85R16 WHT for NPR <i>GY Susman 28036</i> <i>Marked as Exhibit 212 to George Edward's Deposition taken in Arredondo.</i> <i>Also, marked as Exhibit 212 to Ray Young's Deposition taken in Arredondo GY Susman 28467.</i> <i>Also, marked as Exhibit 212 to Mark Grund's Deposition taken in Arredondo bates GY Susman 28349.</i></p>			
339.	<p>ISUZU NPR Truck – Burst Issue <i>GY Susman 28037</i> <i>Marked as Exhibit 213 to George Edward's Deposition taken in Arredondo.</i> <i>Also, marked as Exhibit 213 to Ray Young's Deposition taken in Arredondo GY Susman 28468.</i> <i>Also, marked as Exhibit 213 to Mark Grund's Deposition taken in Arredondo bates GY Susman 28350.</i></p>			
340.	<p>Isuzu NPR – LT215/85R16 LR-E Wrangler HT <i>GY Susman 28038</i> <i>Marked as Exhibit 214 to George Edward's Deposition taken in Arredondo.</i> <i>Also, marked as Exhibit 214 to Mark Grund's Deposition taken in Arredondo bates GY Susman 28351.</i></p>			
341.	<p>ISUZU NPR, LT 215/85R16 Tire Tread Separation Failures <i>GY Susman 28039</i> <i>Marked as Exhibit 215 to George Edward's Deposition taken in Arredondo.</i> <i>Also, marked as Exhibit 215 to Mark Grund's Deposition taken in Arredondo bates GY Susman 28352.</i></p>			
342.	<p>Isuzu NPR LT215/85R15 LR-E Tread Integrity <i>GY Susman 28040-28041</i></p>			

	<i>Marked as Exhibit 216 to George Edward's Deposition taken in Arredondo. Also, marked as Exhibit 216 to Mark Grund's Deposition taken in Arredondo bates GY Susman 28353-28354.</i>			
343.	Isuzu NPR Truck, LT215/85R16 LR-E Wrangler HT <i>GY Susman 28042-28054</i> <i>Marked as Exhibit 217 to George Edward's Deposition taken in Arredondo. Also, marked as Exhibit 217 to Mark Grund's Deposition taken in Arredondo bates GY Susman 28355-28367.</i>			
344.	ISUZU NPR, LT215/85R16 Durability Improvement <i>GY Susman 28055-28058</i> <i>Marked as Exhibit 218 to George Edward's Deposition taken in Arredondo. Also, marked as Exhibit 218 to Iwao Uenoyama's Deposition in Arredondo bates GY Susman 28427-28430.</i> <i>Also, marked as Exhibit 218 to Ray Young's Deposition taken in Arredondo GY Susman 28469-28472.</i> <i>Also, marked as Exhibit 218 to Mark Grund's Deposition taken in Arredondo bates GY Susman 28368-28371.</i>			
345.	Isuzu NPR – LT215/85R16 WHT LR-E <i>GY Susman 28059</i> <i>Marked as Exhibit 219 to George Edward's Deposition taken in Arredondo. Also, marked as Exhibit 219 to Ray Young's Deposition taken in Arredondo GY Susman 28473.</i> <i>Also, marked as Exhibit 219 to Mark Grund's Deposition taken in Arredondo bates GY Susman 28372.</i>			
346.	Trip Report – Weight Study – Monarch/Odwalla <i>GY Susman 28060-28082</i> <i>Marked as Exhibit 220 to George Edward's Deposition taken in Arredondo. Also, marked as Exhibit 220 to Mark Grund's Deposition taken in Arredondo bates GY Susman 28373-28395.</i> <i>Also, marked as Exhibit 29 to Richard Olsen's Deposition taken in Arredondo bates GY Susman 28270-28292.</i>			

	<i>Also, marked as Exhibit 220 to Richard Olsen's Deposition taken in Arredondo bates GY Susman 28434-28456.</i>			
347.	ISUZU NPR LT215/85R16 WHT Meeting at American Isuzu <i>GY Susman 28083-28085</i> <i>Marked as Exhibit 221 to George Edward's Deposition taken in Arredondo.</i> <i>Also, marked as Exhibit 221 to Iwao Uenoyama's Deposition in Arredondo bates GY Susman 28431-28433.</i> <i>Also, marked as Exhibit 221 to Mark Grund's Deposition taken in Arredondo bates GY Susman 28396-28398.</i>			
348.	Isuzu NPR Truck <i>GY Susman 28086-28113</i> <i>Marked as Exhibit 222 to George Edward's Deposition taken in Arredondo.</i> <i>Also, marked as Exhibit 222 to Mark Grund's Deposition taken in Arredondo bates GY Susman 28399.</i>			
349.	Overlay Implementation Meeting, 12/7/98 <i>GY Susman 28474-28475.</i> <i>Marked as Exhibit 232 to Ray Young's Deposition taken in Arredondo.</i>			
350.	LR-E Overlay Implementation Meeting, 2/19/99 <i>GY Susman 28476-28479</i> <i>Marked as Exhibit 233 to Ray Young's Deposition taken in Arredondo.</i>			
351.	LR-E Overlay Implementation Meeting, 5/7/99 <i>GY Susman 28480-28481</i> <i>Marked as Exhibit 237 to Ray Young's Deposition taken in Arredondo.</i>			
352.	Returned Tire Inspection <i>GY Susman 28269</i> <i>Marked as Exhibit 28 to Richard Olsen's Deposition taken in Arredondo.</i>			
353.	Status of 'Tread-Throw' Analysis dated 10/09/95 <i>GY Susman 28297-28300</i> <i>Marked as Exhibit 31 to Richard Olsen's Deposition taken in Arredondo.</i> <i>Also, marked as Exhibit 32 to Richard Olsen's Deposition taken in Arredondo bates GY Susman 28301-28304.</i>			

	<i>Also, marked as Exhibit 18 to Joseph Zekoski's Deposition taken in Corwin bates GY Susman 31680-31691.</i>			
354.	Failure Analysis <i>GY Susman 28307</i> <i>Marked as Exhibit 35 to Richard Olsen's Deposition taken in Arredondo.</i>			
355.	LT-Metric Problem Summary <i>GY Susman 28306</i> <i>Marked as Exhibit 36 to Richard Olsen's Deposition taken in Arredondo.</i>			
356.	LT Recommendations <i>GY Susman 28309</i> <i>Marked as Exhibit 37 to Richard Olsen's Deposition taken in Arredondo.</i>			
357.	LT Phased Production Changes Phase I – Immediate <i>GY Susman 28310</i> <i>Marked as Exhibit 38 to Richard Olsen's Deposition taken in Arredondo.</i>			
358.	Problem Summary <i>GY Susman 28311</i> <i>Marked as Exhibit 39 to Richard Olsen's Deposition taken in Arredondo.</i>			
359.	Damage Claims <i>GY Susman 28312</i> <i>Marked as Exhibit 40 to Richard Olsen's Deposition taken in Arredondo.</i> <i>Also, marked as Exhibit 1 to Joseph Zekoski's Deposition taken in Arredondo bates GY Susman 28166.</i>			
360.	Damage Claims Goodyear/Kelly Light Truck Tires <i>GY Susman 28313</i> <i>Marked as Exhibit 41 to Richard Olsen's Deposition taken in Arredondo.</i>			
361.	RLT Crown Integrity Team Action Items <i>GY Susman 28314-28316</i> <i>Marked as Exhibit 42 to Beale Robinson's Deposition taken in Arredondo.</i>			
362.	KS Fayetteville Tire Specification <i>GY Susman 28317-28319</i> <i>Marked as Exhibit 43 to Beale Robinson's Deposition taken in Arredondo.</i>			
363.	KS Fayetteville Tire Specification <i>GY Susman 28320-28324</i> <i>Marked as Exhibit 44 to Beale Robinson's Deposition taken in Arredondo.</i>			
364.	RLT Adjusted/Returned 'CA' Tires			

	<i>GY Susman 28325</i> <i>Marked as Exhibit 45 to Beale Robinson's Deposition taken in Arredondo.</i>			
365.	Gadsden Tire Specification <i>GY Susman 28326-28328</i> <i>Marked as Exhibit 46 to Beale Robinson's Deposition taken in Arredondo.</i>			
366.	Failure Mode <i>GY Susman 28114</i> <i>Marked as Exhibit 1 to Joseph Zekoski's Deposition taken in Arredondo.</i>			
367.	Kelly Springfield Tire Conditions <i>GY Susman 28115-28121</i> <i>Marked as Exhibit 2 to Joseph Zekoski's Deposition taken in Arredondo.</i>			
368.	Damage Claims Goodyear/Kelly by Date of Claim <i>GY Susman 28167</i> <i>Marked as Exhibit 7 to Joseph Zekoski's Deposition taken in Arredondo.</i>			
369.	Adjustable Tire Condition <i>GY Susman 28122-28152</i> <i>Marked as Exhibit 8 to Joseph Zekoski's Deposition taken in Arredondo.</i>			
370.	Confirmation of Change in Specification <i>GY Susman 28171</i> <i>Marked as Exhibit 10 to Joseph Zekoski's Deposition taken in Arredondo.</i>			
371.	Radial Light Truck <i>GY Susman 28172-28175</i> <i>Marked as Exhibit 11 to Joseph Zekoski's Deposition taken in Arredondo.</i>			
372.	Root Cause Investigation #2 Wire Treatment Differences <i>GY Susman 28176</i> <i>Marked as Exhibit 12 to Joseph Zekoski's Deposition taken in Arredondo.</i>			
373.	Confirmation of Change in Specifications <i>GY Susman 28177</i> <i>Marked as Exhibit 13 to Joseph Zekoski's Deposition taken in Arredondo.</i>			
374.	Gadsden Tire Specification <i>GY Susman 28178-28180</i> <i>Marked as Exhibit 14 to Joseph Zekoski's Deposition taken in Arredondo.</i>			
375.	Overinflation – Underinflation – Proper Inflation <i>GY Susman 28181</i>			

	<i>Marked as Exhibit 15 to Joseph Zekoski's Deposition taken in Arredondo.</i>			
376.	Ford Draws on Goodyear to Help Avert Concerns on Tire-Pressure Information <i>GY Susman 28182</i> <i>Marked as Exhibit 16 to Joseph Zekoski's Deposition taken in Arredondo.</i>			
377.	Tires Converted to Overlay <i>GY Susman 28183</i> <i>Marked as Exhibit 17 to Joseph Zekoski's Deposition taken in Arredondo.</i>			
378.	Tread Separation on Wrangler AT Tires <i>GY Susman 28196</i> <i>Marked as Exhibit 20 to Joseph Zekoski's Deposition taken in Arredondo.</i>			
379.	RLT Belt Design Standards <i>GY Susman 28197</i> <i>Marked as Exhibit 21 to Joseph Zekoski's Deposition taken in Arredondo.</i>			
380.	Preliminary Impact Assessment – Phase I <i>GY Susman 28198-28201</i> <i>Marked as Exhibit 22 to Joseph Zekoski's Deposition taken in Arredondo.</i>			
381.	RLT LR-E Overlay Applications Tire Cost Analysis <i>GY Susman 28202-28204</i> <i>Marked as Exhibit 23 to Joseph Zekoski's Deposition taken in Arredondo.</i>			
382.	Kickoff Meeting, 2/16/96 <i>GY Susman 28205</i> <i>Marked as Exhibit 24 to Joseph Zekoski's Deposition taken in Arredondo.</i>			
383.	Minutes of 11/10/95 Management Meeting – Tread/Top Belt Throws +Revision+ <i>GY Susman 28206</i> <i>Marked as Exhibit 25A to Joseph Zekoski's Deposition taken in Arredondo.</i>			
384.	<i>Tread/Top Belt 'Throws' dated 11/10/1995</i> <i>GY Susman 28207-28227</i> <i>Marked as Exhibit 25B to Joseph Zekoski's Deposition taken in Arredondo.</i>			
385.	Minutes of 11/10/95 Management Meeting – Tread/Top Belt Throws +REVISION+ DATED 11/14/95 with attachment <i>GY Susman 20953-20998</i>			
386.	Goodyear Tire Manufacturing Process <i>GY Susman 30445</i> <i>Marked as Exhibit 2 to Richard Olsen's Deposition taken in Hebert.</i>			

387.	<p>Test Driver's Death Questioned as Goodyear Inquiry Nears End <i>GY Susman 30446-30447</i> <i>Marked as Exhibit 3 to Richard Olsen's Deposition taken in Hebert.</i></p>			
388.	<p>Adjustment Procedure Manual <i>GY Susman 30114-30170</i> <i>Marked as Exhibit 4 to Richard Olsen's Deposition taken in Hebert.</i></p>			
389.	<p><i>Tread/Top Belt 'Throws' dated 11/10/95</i> <i>GY Susman 29968-30018</i> <i>Marked as Exhibit 5 to Richard Olsen's Deposition taken in Hebert.</i></p>			
390.	<p>Handwritten notes <i>GY Susman 31544-31545</i> <i>Marked as Exhibit 1 to Joseph Zekoski's Deposition taken in Corwin.</i></p>			
391.	<p>Fourth Amended Class Action Complaint for Damages <i>GY Susman 31694-31716</i> <i>Marked as Exhibit 2 to Joseph Zekoski's Deposition taken in Corwin.</i></p>			
392.	<p>Expert Report of R.J. Grogan <i>GY Susman 31717-31726</i> <i>Marked as Exhibit 3 to Joseph Zekoski's Deposition taken in Corwin.</i></p>			
393.	<p>Goodyear Replacing Truck Tires; Akron Firm Maintains Model Probed for Tears in Tread Not Defective <i>GY Susman 31546-31547</i> <i>Marked as Exhibit 10 to Joseph Zekoski's Deposition taken in Corwin.</i></p>			
394.	<p>Goodyear Facing Government Safety Investigation Involving 27 Million Tires <i>GY Susman 31548-31549</i> <i>Marked as Exhibit 11 to Joseph Zekoski's Deposition taken in Corwin.</i></p>			
395.	<p>Current RLT Gauges <i>GY Susman 31554</i> <i>Marked as Exhibit 13 to Joseph Zekoski's Deposition taken in Corwin.</i></p>			
396.	<p>Status of 'Tread Throw' Analysis dated 10/16/95 <i>GY Susman 31641-31647</i> <i>Marked as Exhibit 15 to Joseph Zekoski's Deposition taken in Corwin.</i></p>			
397.	<p><i>Tread/Top Belt 'Throws' dated 10/25/95</i> <i>GY Susman 31648-31657.</i></p>			

	<i>Marked as Exhibit 16 to Joseph Zekoski's Deposition taken in Corwin.</i>			
398.	Minutes of 1/25/96 Management Meeting Tread/Top Belt Throws <i>GY Susman 31658-31679</i> <i>Marked as Exhibit 17 to Joseph Zekoski's Deposition taken in Corwin.</i>			
399.	Tread/Top Belt Throw <i>GY Susman 31692-31693</i> <i>Marked as Exhibit 19 to Joseph Zekoski's Deposition taken in Corwin.</i>			
400.	RLT Crown Integrity <i>GY Susman 31733-31746</i> <i>Marked as Exhibit 24 to Joseph Zekoski's Deposition taken in Corwin.</i>			
401.	RLT LR-E Crown Integrity Improvement 'ACT' Team <i>GY Susman 31747-31762</i> <i>Marked as Exhibit 25 to Joseph Zekoski's Deposition taken in Corwin.</i>			
402.	RLT LR-E Crown Integrity Improvement 'ACT' Team <i>GY Susman 31763-31765</i> <i>Marked as Exhibit 26 to Joseph Zekoski's Deposition taken in Corwin.</i>			
403.	LR-E Testing <i>GY Susman 31766-31796</i> <i>Marked as Exhibit 27 to Joseph Zekoski's Deposition taken in Corwin.</i>			
404.	Load Range E Durability/Crown Study <i>GY Susman 31797-31804</i> <i>Marked as Exhibit 28 to Joseph Zekoski's Deposition taken in Corwin.</i>			
405.	Total RLT Capacity vs. Requirement <i>GY Susman 31825-31832</i> <i>Marked as Exhibit 30 to Joseph Zekoski's Deposition taken in Corwin.</i>			
406.	Isuzu – LT215/85R16 WHT Tread Throw Issue Information <i>GY Susman 31874-31879</i> <i>Marked as Exhibit 32 to Joseph Zekoski's Deposition taken in Corwin.</i>			
407.	Isuzu NPR Tread Separation F.T.A <i>GY Susman 31880</i> <i>Marked as Exhibit 33 to Joseph Zekoski's Deposition taken in Corwin.</i>			
408.	Load Range E Overlay Conversion Plant <i>GY Susman 31881-31882</i>			

	<i>Marked as Exhibit 34 to Joseph Zekoski's Deposition taken in Corwin.</i>			
409.	RLT Load Range E Overlay Conversion Summary <i>GY Susman 31883-31884</i> <i>Marked as Exhibit 35 to Joseph Zekoski's Deposition taken in Corwin.</i>			
410.	Excerpt from August 24, 1998 Prepolicy Report Summary <i>GY Susman 31885</i> <i>Marked as Exhibit 36 to Joseph Zekoski's Deposition taken in Corwin.</i>			
411.	Robert T. Jenkins' Letter to Editor and Goodyear <i>GY Susman 31886-31887</i> <i>Marked as Exhibit 37 to Joseph Zekoski's Deposition taken in Corwin.</i>			
412.	Tire Service Life for Passenger Car and Light Truck Tires <i>GY Susman 30671-30672</i> <i>Marked as Exhibit 2 to Eric Mizner Deposition taken in Ochoa-Garcia.</i>			
413.	Oxygen Content as a Function of Age (at the belt edge) <i>GY Susman 30676</i> <i>Marked as Exhibit 4 to Eric Mizner Deposition taken in Ochoa-Garcia.</i>			
414.	Goodyear's submission to NHTSA regarding PE00-046 <i>GY Susman 00001-006325; 20845-25871</i>			
415.	Goodyear LT235/85R16 Claims Files			
416.	Rule 1006 Summary of Goodyear LT235/85R16 Claims Files			

Plaintiffs reserve the right to submit as an exhibit any exhibits identified in Defendant's Exhibit Lists; any exhibits necessary for foundational purposes; and any exhibits necessary for impeachment and or rebuttal purposes.

KASTER, LYNCH, FARRAR & BALL, L.L.P.

Dated: January 28, 2020

By: 
 Kyle Wayne Farrar (Pro Hac Vice)
 Texas Bar No. 24034828
 Wesley Todd Ball (Pro Hac Vice)
 Texas Bar No. 24038754
 1117 Herkimer Street
 Houston, TX 77008
 (713) 221-8300 (Telephone)

(713) 221-8301 (Facsimile)
Email: kyle@fbtrial.com

and

Paul E. Godlewski (#35567)
SCHWEBEL GOETZ & SIEBEN, P.A.
5120 IDS Center
80 South Eighth Street
Minneapolis, Minnesota 55402-2246
612-377-7777 (Telephone)
612-333-6311 (Facsimile)
Email: pgodlewski@schwebel.com

and

Michael F. Coyle
FRASER, STRYKER LAW FIRM
409 South 17th Street
Ste. 500, Energy Plaza
Omaha, Nebraska 681025
(402) 341-6000 (Telephone)
(402) 341-8290 (Facsimile)
mcoyle@fraserstryker.com